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James K. Smith  
Director  
Federal Relations

March 29, 1996

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MAR 29 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

Re: **Ex Parte**

In the Matter of Bell Operating Companies' Joint Petition for  
Waiver of Computer II Rules; Ameritech's Plan to Provide  
Comparably Efficient Interconnection to Providers of  
Personal Access Service, CC Docket Nos. 85-229, 90-623 and  
95-20

Dear Mr. Caton:

Ameritech respectfully requests that the Commission expeditiously approve its Comparably Efficient Interconnection ("CEI") Plan for Personal Access Service ("PAS"), as filed September 1, 1995. In the seven months since this Plan was filed, MCI was the only party attempting to argue against the Plan's full compliance with all the Commission's CEI parameters. The Commission should summarily reject MCI's pleas for a new "micro-unbundling" requirement for BOC enhanced service offerings. Since MCI's argument is unsupported by either the Commission's rules or any relevant precedent, Ameritech's Plan should be approved as filed.

Ameritech's Plan describes a full set of CEI interfaces<sup>1</sup> for all underlying basic services, each of which any enhanced service provider ("ESP") may use to offer a competing service. As the Plan describes in detail, each of these basic services is available to all competitors on the same terms and conditions, at the same rates, with the same published interfaces, using the same signaling methods, with the same transmission and service quality, and on the same basis in all other material

<sup>1</sup> See Attachment A to the Plan for a listing of, and tariff pages for, all underlying basic services which the PAS platform uses to provide the resulting enhanced service

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respects, as they are available to Ameritech's enhanced service operations. MCI does not, and indeed cannot, dispute that the Plan meets all such requirements.

The "problem" which MCI attempts to create is not that these CEI interfaces are unavailable to it, but rather that they are not located exactly where MCI would prefer them to be -- inside the PAS platform. In its attempt to transport the Commission's CEI requirements to the internal workings of the platform, MCI advances the novel proposition that Ameritech must, for each and every feature inherent in PAS, either prove that the underlying functionality is "enhanced" or else file a tariff for it. MCI argues that if a BOC "chooses to employ" any functionalities that "may be offered as an adjunct to basic telephone service", that BOC "has no choice as to whether to tariff them" because they are basic services.<sup>2</sup>

Of course, the logical result of creating such a "micro-unbundling" approach would be to require new CEI interfaces at both ends of each piece of wire inside the PAS platform, since each would represent a "transmission path over which the telephone call may be completed."<sup>3</sup> The Commission's rules do not require this result, nor have they ever been interpreted to do so. This undisputed fact explains why MCI could not cite even a single CI-II or CI-III Order in support of imposing such a new CEI requirement.

MCI's claim that PAS is the "sort of garden variety routing that occupies large portions of carrier tariffs"<sup>4</sup> is similarly devoid of any support. As explained in the Plan itself<sup>5</sup> and Ameritech's Reply Comments,<sup>6</sup> PAS provides a variety of enhanced functionality which offers customers advanced telecommunications capabilities not available in any tariffed offering. This fact is not refuted by MCI's argument for the imposition of an ever-more-granular series of unbundling requirements.

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<sup>2</sup> MCI letter of 12/1/95 ("MCI letter"), at 2

<sup>3</sup> MCI letter, at 2-3

<sup>4</sup> MCI letter, at 3

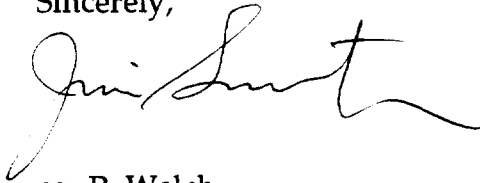
<sup>5</sup> Plan, at 2-4

<sup>6</sup> Reply Comments of Ameritech, filed October 2, 1995, at 2-3

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Since Ameritech's PAS CEI Plan meets all the Commission's CEI requirements, and Ameritech has responded to all staff inquiries, expeditious approval of the Plan is requested.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Smith". The signature is fluid and cursive, with a long horizontal stroke at the end.

cc: R. Welch  
R. Crellin  
B. Scinto

CERTIFICATE OF SERVICE

I, Toni R. Acton, do hereby certify that a copy of the foregoing **Ex Parte** regarding Ameritech's Plan to Provide Comparably Efficient Interconnection to Providers of Personal Access Service, has been served on the parties listed below, via first class mail, postage prepaid, on this 29th day of March 1996.

By:   
Toni R. Acton

M. Robert Sutherland  
A. Kirven Gilbert III  
Attorneys for Bellsouth  
4300 Southern Bell Center  
675 West Peachtree Street, NW  
Atlanta, GA 30375

\*International Transcription  
Services, Inc.  
2100 M Street, NW  
Suite 140  
Washington, DC 20037

Frank W. Krogh  
Attorney for  
MCI Telecommunications Corporation  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006

\*Janice M. Myles  
Federal Communications  
Commission  
1919 M Street, NW  
Room 544  
Washington, DC 20554

Robert B. McKenna  
Corporate Counsel  
US West, Inc.  
1801 California Street  
Suite 5100  
Denver, CO 80202

Jeffrey B. Thomas  
Senior Counsel  
Pacific Bell  
1401 New Montgomery Street  
San Francisco, CA 94105